

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CARRIE VASSEL, KAREN  
BURNAUGH, TOM GARDEN, ADA  
AND ANGELI GOZON, PATRICIA A.  
HENSLEY, CLYDIENE FRANCIS,  
PETER LOWEGARD, and GRANT  
BRADLEY individually and on behalf of  
a class of similarly situated individuals,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF  
AMERICA, INC., a New Jersey  
corporation, d/b/a AUDI OF AMERICA,  
INC.,

Defendant.

Case No. 1:21-cv-10546-NHL-EAP

**DECLARATION OF RAMZY LADAH IN SUPPORT OF PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

I, Ramzy Ladah, hereby declare as follows:

1. I am an attorney duly licensed to practice law before all of the courts in the State of California, and the State of California as well as before the United States Court of Appeals for the Ninth Circuit, the United States District Court of Nevada, District Court of Central California.

2. I am a partner at Ladah Law Firm PLLC ("Ladah Law"). I make this declaration in support of the Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the facts stated below and, if called upon, could competently testify thereto.

3. The accompanying Declaration of Tarek H. Zohdy, which is being filed contemporaneously herewith, accurately summarizes the overview of the litigation, the settlement negotiations and mediation, the procedural history, the work undertaken by Plaintiffs and Class Counsel to initiate this litigation and for the benefit of the Class, the substantial contingent risks in and the complexity of this litigation, and the benefits of the Settlement.

4. My firm, Ladah Law, has been engaged in complex civil litigation since 2010. Our firm is collectively licensed in the states of Nevada, California, Arizona, and New York. Our firm's practice areas include Personal Injury, Commercial Litigation, Contracts, Insurance Law, Employment Law, Mass Torts, Labor Law, and Real Estate Law. Our compensation is almost exclusively from court-awarded fees, court-approved settlements, and contingent fee agreements.

5. Ladah Law has obtained numerous large jury verdicts for its clients over the past few years alone, including a jury verdict in a trucking collision case for \$10,000,000. Ladah Law as a firm has collected over \$300,000,000 in verdicts and settlements in the past 10 years.

6. Throughout the course of investigation, pleadings, mediation, and filing of the Settlement Agreement with the Court, Ladah Law, along with Class Counsel Capstone and Berger Montague's attorneys have devoted significant time and resources to the investigation, development, and resolution of this case.

7. Ladah Law is not representing clients with interests at odds with the

interests of the Class Members.

8. Based on my experience, the Settlement provides substantial relief to the Settlement Class, is fair, reasonable, and adequate and the Settlement treats all Settlement Class Members equitably. I ask that the Court preliminarily approve the Settlement and authorize notice of the settlement to go out to the class.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: October 10, 2023

By: 

Ramzy Ladah